

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

THOMAS TAYLOR PEARCE,	:
AKA THOMAS T. PEARCE, AND	: CHAPTER 13
JENIFER MARIE PEARCE, FKA	:
JENIFER MARIE MILLER, FKA	:
JENIFER MARIE EMKEY, AKA	:
JENIFER M. PEARCE, AKA	:
JENIFER M. MILLER PEARCE	:
Debtor(s)	:
	:
JACK N. ZAHAROPOULOS,	:
CHAPTER 13 TRUSTEE,	:
Movant	:
	:
vs.	:
	:
THOMAS TAYLOR PEARCE,	:
AKA THOMAS T. PEARCE, AND	:
JENIFER MARIE PEARCE, FKA	:
JENIFER MARIE MILLER, FKA	:
JENIFER MARIE EMKEY, AKA	:
JENIFER M. PEARCE, AKA	:
JENIFER M. MILLER PEARCE	:
Respondent(s)	: CASE NO. 1:24-bk-02059-HWV

TRUSTEE'S OBJECTION TO THIRD AMENDED CHAPTER 13 PLAN

AND NOW, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Debtor(s)' Plan violates 11 U.S.C. § 1325(a)(4) in that the value of property to be distributed under the Plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7. More specifically, Debtor(s) has/have excess non-exempt equity in the following:

- a. Residential real estate. The Trustee has requested proof of the value of Debtor(s)' home as stated in his/her/their schedules. Further, the Trustee requests a copy of a listing agreement.

WHEREFORE, Trustee alleges and avers that the Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor(s)' Plan;
- b. dismiss or convert Debtor(s)' case; and
- c. provide such other relief as is equitable and just.

Dated: August 26, 2025

Respectfully submitted:

/s/ Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Gary J. Imblum, Esquire  
4615 Derry Street  
Harrisburg, PA 17111

Dated: August 26, 2025

/s/ Matthew Harnsberger, Legal Assistant  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee